

January 28, 2025

**BY ECF**

The Honorable Valerie E. Caproni  
United States District Judge  
500 Pearl Street  
New York, NY 10007

**Re: *Doe v. Combs, et. al.*, Case No. 24-cv-08024 (VEC)**

Dear Judge Caproni:

We write jointly on behalf of the Plaintiff in this action and defendants Sean Combs, Daddy's House Recordings Inc., CEOpCo, LLC d/b/a Combs Global f/k/a Combs Enterprises, LLC, Bad Boy Entertainment Holdings, Inc., Bad Boy Productions Holdings, Inc., Bad Boy Books Holdings, Inc., Bad Boy Entertainment LLC, and Bad Boy Productions LLC (the "Combs Defendants") and defendant Bad Boy Records, LLC.

The undersigned parties respectfully request that the Court's previously ordered deadline to submit a case management plan, currently scheduled for February 6, 2025, and initial pretrial conference, currently scheduled for February 14, 2025, be adjourned pending resolution of Defendants' anticipated motions to dismiss. *See* ECF #20. Per the stipulated deadline approved in the Court's prior order (ECF #30), Defendants intend to a file motions to dismiss the Complaint on or before March 11, 2025.

All parties believe that it will be more efficient to defer discovery pending resolution of the anticipated motions to dismiss. If these motions are successful, they may result in complete dismissal of this action in its entirety or against certain defendants, which could significantly alter the scope of discovery that needs to be conducted.

Discovery in this matter is further complicated by the impending criminal trial of Defendant Sean Combs, which is scheduled to begin before Judge Subramanian on May 5, 2025. *See USA v. Combs*, Case No. 24-cr-00542 (S.D.N.Y.). The parties agree that it is impractical to proceed with various aspects of fact discovery involving Mr. Combs until this criminal trial is concluded. Deferring a case schedule pending the motions to dismiss will therefore have the added benefit of allowing time for the criminal matter to conclude.

Plaintiff made one prior request to adjourn this conference on service-related grounds (ECF #19), which resulted in a rescheduling from January 10, 2025 to February 14, 2025.

Hon. Valerie E. Caproni

January 28, 2025

Page 2 of 2

Respectfully submitted,

/s/ Mark Cuccaro

Mark Cuccaro

SHER TREMONTE LLP

90 Broad Street, 23rd Fl.

New York, New York 10004

T: 212.202.2600

[mcuccaro@shertremonte.com](mailto:mcuccaro@shertremonte.com)

*Counsel for the Combs Defendants*

/s/ Antigone Curis

Antigone Curis

CURIS LAW, PLLC

52 Duane Street, 7<sup>th</sup> Fl.

New York, NY 10007

(646) 335-7220

[antigone@curislaw.com](mailto:antigone@curislaw.com)

*Counsel for Plaintiff John Doe*

/s/ Donald S. Zakarin

Donald S. Zakarin

PRYOR CASHMAN, LLP

7 Times Square

New York, NY 10036

212-326-0108

[dzakarin@pryorcashman.com](mailto:dzakarin@pryorcashman.com)

*Counsel for Defendant Bad Boy  
Records, LLC*